



February 6, 2003

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW, Room TW-A325  
Washington, D.C. 20554

Re: CC Docket No. 01-338

Dear Ms. Dortch:

On Thursday, February 6, 2003, Rich Barth and the undersigned of Motorola met with Commissioner Kevin J. Martin and Daniel Gonzalez, Senior Legal Advisor to Commissioner Martin, to discuss the broadband issues contained in the Triennial Review proceedings. Mr. Barth and I expressed our views that:

- The current regulatory framework imposes significant burdens on the major ILECs by requiring them to unbundle the network elements used to provide broadband services at cost-based rates. These unbundling requirements have made investment in new facilities unattractive.
- ILEC investment will provide much-needed jumpstart for the technology equipment manufacturing industry and prevent further job and operational cutbacks in this beleaguered sector.
- Equipment suppliers will reinvest their resources in R&D and improve their products.
- With the ILECs free from unbundling obligations, they will offer a full package of services, competing with other broadband service providers. Other broadband service providers will respond with more aggressive deployment, lower prices and innovative service packages. All of these developments will help consumers.

Mr. Barth and I expressed our views that the Commission should ensure that unbundling requirements are not placed on packet networks or equipment attached to the cooper loop that is used in conjunction with packetized transmission over the cooper loop.

Please contact me at (202) 371-6896 should you have any questions regarding this matter.

Respectfully submitted,

/s/ Jeanine Poltronieri

Jeanine Poltronieri  
Director  
Telecommunications Regulation and Strategy  
Motorola

C: Commissioner Kevin J. Martin  
Daniel Gonzalez